

EXHIBIT 2

From: Daniela Nanau dn@danielananau.com
Subject: Re: Boucher, et al. v. Canisius--Confidentiality Agreement
Date: December 21, 2023 at 1:55 PM
To: Naassana, Christine M. CNaassana@wardgreenberg.com
Cc: D'Antonio, Tom TDAntonio@wardgreenberg.com

Christine,

The documents already produced with the Bates range P 1-880, are documents demonstrating Plaintiffs' damages, and is responsive to Defendant's Document Request No. 7. These documents were already produced as part of Plaintiffs' Rule 26 disclosures. As such, the documents are part of the record of this case, as provided during discovery.

There is no rule that permits the tit for tat that you are describing below and I encourage you and Tom to reconsider this position or I will write to the Court. I am able to produce more documents today together with my objections. Defendants have the same obligations to produce discovery in accordance with Rule 34.

Additionally, you did not produce the insurance agreement applicable to this litigation as required by Rule 26, which was due in August. There is no part of that rule, or the local rule, that permits withholding insurance documents until your first document production. As such, that document is overdue.

Daniela

Daniela Nanau
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On Dec 21, 2023, at 1:36 PM, Naassana, Christine M. <CNaassana@wardgreenberg.com> wrote:

Daniela,

The University served document demands on November 21st and plaintiffs served their demands one week later, on November 28th. Our objections are thus each due 30 days after service, and one week apart.

As I read your note from yesterday, plaintiffs' actual production will be made at some point after their objections are served. We are amenable to your producing documents after the service of objections, but keeping that same 7-day difference.

I do note that you had, as part of the mediation process, chosen to include various medical records and tax documents as part of your mediation submission. Those materials, however, were not provided as part of the discovery process in which we are now engaged, nor were they forwarded in response to any discovery demands from the University.

I hope this response satisfactorily explains our reasoning. I am also hopeful that we can proceed in a productive and reasonable manner in the discovery process. I wish you and your family a happy holiday season.

Christine M. Naassana | WARD GREENBERG HELLER & REIDY LLP

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<image001.jpg>

From: Daniela Nanau <dn@danielananau.com>

Sent: Thursday, December 21, 2023 8:10 AM

To: Naassana, Christine M. <CNaassana@wardgreenberg.com>

Cc: D'Antonio, Tom <TDAntonio@wardgreenberg.com>

Subject: Re: Boucher, et al. v. Canisius--Confidentiality Agreement

[USE CAUTION: This email originated from outside of the organization]

Christine,

I have already produced almost one thousand documents in this case.

I do not understand why you are withholding documents until one week after I make another production. Can you explain?

Daniela

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